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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA L.
GOODMAN IN SUPPORT OF
DEFENDANTS' MOTIONS *IN LIMINE*
NOS. 2 AND 22-25**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

1 I, Martha L. Goodman, declare as follows:

2 1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants
3 Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in
4 good standing of the Bar of the District of Columbia. I make this declaration in support of Defendants’
5 Motions *in Limine* Nos. 2 and 22-25. I make this declaration based on personal knowledge and if called
6 as a witness, I could and would competently testify to the matters set forth herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of a document produced by Uber in this
8 action bearing the Bates numbers UBER00008520 through UBER00008522.

9 3. Attached as **Exhibit 2** is a true and correct copy of a document produced by Uber in this
10 action bearing the Bates number UBER00064344.

11 4. Attached as **Exhibit 3** is a true and correct copy of a document produced by Waymo LLC
12 (“Waymo”) in this action bearing the Bates numbers WAYMO-UBER-00086885 through WAYMO-
13 UBER-00086892.

14 5. Attached as **Exhibit 4** is a true and correct copy of a document produced by Waymo in
15 this action bearing the Bates numbers WAYMO-UBER-00086893 through WAYMO-UBER-00086906.

16 6. Attached as **Exhibit 5** is a true and correct copy of a document produced by Uber in this
17 action bearing the Bates number UBER00086503.

18 7. Attached as **Exhibit 6** is a true and correct copy of a document produced by Benchmark
19 Capital Partners (“Benchmark”) in this action bearing the Bates numbers BENCHMARK-
20 WAYMO_00000168 through BENCHMARK-WAYMO_00000169.

21 8. Attached as **Exhibit 7** is a true and correct copy of the Verified Complaint filed in the
22 *Benchmark Capital Partners VII, L.P. v. Kalanick*, No. 2017-0575-SG (Del. Ch. filed Aug. 10, 2017)
23 (the “Benchmark action”), dated August 10, 2017.

24 9. Attached as **Exhibit 8** is a true and correct copy of excerpts of Plaintiff’s Amended
25 Fourth Supplemental Objections and Responses to Uber’s First Set of Interrogatories (Nos. 1-11), served
26 on August 10, 2017.

27 10. Attached as **Exhibit 9** is a true and correct copy of excerpts of the certified 30(b)(6)
28 deposition transcript of Uber Technologies, Inc. and Ottomotto, LLC, by and through their designated

1 representative, Eric Meyhofer, dated August 18, 2017.

2 11. Attached as **Exhibit 10** is a true and correct copy of excerpts of the certified 30(b)(6)
3 deposition transcript of Waymo LLC, by and through its designated representative, Aslan “Shawn”
4 Bananzadeh, dated August 24, 2017.

5 12. Attached as **Exhibit 11** is a true and correct copy of excerpts of the Opening Expert
6 Report of Lambertus Hesselink, Ph.D., served by Waymo on August 24, 2017.

7 13. Attached as **Exhibit 12** is a true and correct copy of excerpts of Volume One of the
8 Expert Report of Michael J. Wagner, served by Waymo on August 24, 2017.

9 14. Attached as **Exhibit 13** is a true and correct copy of excerpts of the deposition transcript
10 of John William Gurley, dated August 24, 2017.

11 15. Attached as **Exhibit 14** is a true and correct copy of an Order in the Benchmark action
12 staying the case and referring the matter to arbitration dated August 30, 2017.

13 16. Attached as **Exhibit 15** is a true and correct copy of Uber’s Supplemental Privilege Log,
14 dated and served on September 5, 2017.

15 17. Attached as **Exhibit 16** is a true and correct copy of Sofreh LP and Stephen Russell’s
16 Motion to Intervene dated August 24, 2017, made in the Benchmark action.

17 18. Attached as **Exhibit 17** is a true and correct copy of excerpts of the deposition transcript
18 of Radu Raduta, dated July 13, 2017.

19 19. Attached as **Exhibit 18** is a true and correct copy of excerpts of the deposition transcript
20 of Gaetan Pennecot, dated June 14, 2017.

21 20. Attached as **Exhibit 19** is a true and correct copy of excerpts of Plaintiff’s Supplemental
22 Responses and Objections to Uber’s Interrogatory Nos. 1, 3, 4, 9, 10, 25, 26, 30, and 34, served on
23 August 24, 2017.

24 21. Attached as **Exhibit 20** is a true and correct copy of excerpts of the deposition transcript
25 of Sasha Zbrozek, dated September 6, 2017.

26 22. Attached as **Exhibit 21** is a true and correct copy of excerpts of the Responsive Expert
27 Report of Dr. Michael Lebby, served by Uber on September 7, 2017.

23. Attached as **Exhibit 22** is a true and correct copy of excerpts of the 30(b)(6) deposition transcript of Gary Brown, dated August 8, 2017.

24. Attached as **Exhibit 23** is a true and correct copy of Velodyne Acoustics, Inc. User's Manual and Programing Guide for HDL-64E S3, High Definition LiDAR Sensor.

25. Attached as **Exhibit 24** is a true and correct copy of Velodyne Acoustics, Inc. schematics – Outline Drawing HDL-64E S3, dated April 21, 2015.

26. Attached as **Exhibit 25** is a true and correct copy of a document produced by Uber in this action bearing the Bates number UBER00140729.

27. Attached as **Exhibit 26** is a true and correct copy of a document produced by Uber in this action bearing the Bates number UBER00140730 through UBER00140731.

28. Attached as **Exhibit 27** is a true and correct copy of excerpts of the deposition transcript of Gaetan Pennecot, dated June 16, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 7th day of September, 2017, in Washington, DC.

/s/ Martha L. Goodman

Martha L. Goodman

ATTESTATION OF E-FILED SIGNATURE

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has concurred in this filing.

/s/ Karen L. Dunn

Karen L. Dunn